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**From:** Robinson, Valois [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4217A71307D4429B7BDC7C80EB40C7D-SHEA, VALOIS]  
**Sent:** 10/9/2020 2:18:31 PM  
**To:** Arnold, Rick [Arnold.Rick@epa.gov]  
**Subject:** RE: One more requested revision to Class V Permit

Thanks! I will adapt this language for Class III.

*Valois*

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Valois Robinson  
EPA Region 8  
Underground Injection Control Program  
MailCode: 8WD-SDU  
1595 Wynkoop Street  
Denver, CO 80202-1129  
(303) 312-6276  
robinson.valois@epa.gov

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**From:** Arnold, Rick <Arnold.Rick@epa.gov>  
**Sent:** Thursday, October 8, 2020 12:33 PM  
**To:** Minter, Douglas <Minter.Douglas@epa.gov>  
**Cc:** Robinson, Valois <Robinson.Valois@epa.gov>  
**Subject:** RE: One more requested revision to Class V Permit

Thanks Douglas.

## Ex. 5 Deliberative Process (DP)

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**From:** Minter, Douglas <Minter.Douglas@epa.gov>  
**Sent:** Thursday, October 8, 2020 11:36 AM  
**To:** Arnold, Rick <Arnold.Rick@epa.gov>; Robinson, Valois <Robinson.Valois@epa.gov>  
**Subject:** RE: One more requested revision to Class V Permit

Hi Rick: here is my thinking.

## Ex. 5 Deliberative Process (DP)

Let me know if either of you think differently and we can discuss with Lucita.

This should help limit management's review time by having them focus on the RTC and final permits.

Douglas

**From:** Arnold, Rick <[Arnold.Rick@epa.gov](mailto:Arnold.Rick@epa.gov)>  
**Sent:** Wednesday, October 7, 2020 6:12 PM  
**To:** Robinson, Valois <[Robinson.Valois@epa.gov](mailto:Robinson.Valois@epa.gov)>  
**Cc:** Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>  
**Subject:** RE: One more requested revision to Class V Permit

## Ex. 5 Deliberative Process (DP)

**From:** Robinson, Valois <[Robinson.Valois@epa.gov](mailto:Robinson.Valois@epa.gov)>  
**Sent:** Wednesday, October 7, 2020 6:06 PM  
**To:** Arnold, Rick <[Arnold.Rick@epa.gov](mailto:Arnold.Rick@epa.gov)>  
**Cc:** Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>  
**Subject:** RE: One more requested revision to Class V Permit

Let's run this by Lucita. What this change in their comments?

*Valois*

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Valois Robinson  
EPA Region 8  
Underground Injection Control Program  
MailCode: 8WD-SDU  
1595 Wynkoop Street  
Denver, CO 80202-1129  
(303) 312-6276  
[robinson.valois@epa.gov](mailto:robinson.valois@epa.gov)

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**From:** Arnold, Rick <[Arnold.Rick@epa.gov](mailto:Arnold.Rick@epa.gov)>  
**Sent:** Wednesday, October 7, 2020 6:01 PM  
**To:** Robinson, Valois <[Robinson.Valois@epa.gov](mailto:Robinson.Valois@epa.gov)>  
**Cc:** Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>  
**Subject:** One more requested revision to Class V Permit

Hi Valois,

Powertech has requested the following change to the Class V Permit related to major modifications:

**Requested Change:**

Powertech requests the following language be added to III.C.2 to allow for changes in well construction throughout the duration of well performance in accordance with the regulation: "The permittee has the flexibility to make changes in construction by means of a minor modification with the approval of the Director as long as the resulting Class V well construction is consistent with Federal UIC regulations and Part III of this Permit and so long as no change is made prior to approval by the Director. Allowable minor modifications include, but are not be limited to, adding perforations in the permitted injection zone and running a liner."

## Ex. 5 Deliberative Process (DP)

“After initial well construction is complete, any subsequent changes in well construction other than the addition of perforations to an approved injection zone in accordance with Part IV, Section F.3 will require a major modification of this Area Permit according to 40 CFR § 144.39 and § 124.5.”

## **Ex. 5 Deliberative Process (DP)**

Thanks.

Rick Arnold  
Physical Scientist  
USEPA Region 8 Underground Injection Control Program  
(303) 312-6788